

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

ASHLEY CATATAO

Plaintiff,

vs.

CASE NO.: 1:22-CV-10620

SIG SAUER, INC.

Defendants.

JOINT STIPULATED MOTION TO EXTEND DEADLINES

Plaintiff Ashley Catatao, by and through her undersigned counsel, Saltz Mongeluzzi & Bendesky P.C. (“Plaintiff”), and Defendant Sig Sauer, Inc. by and through its undersigned counsel, Littleton Joyce Ughetta & Kelly LLP (“Defendant”) (collectively, the “Parties”), hereby submit the following Joint Stipulated Motion to Extend all Deadlines.

I. CASE FACTS

1. This is a product liability action arising from an alleged accidental discharge of Plaintiff’s Sig Sauer P320 pistol on April 6, 2022.
2. On August 26, 2024, the Honorable Patti B. Saris entered an order resetting the Final Pretrial Conference from October 30, 2024, to January 7, 2025 and resetting the Jury Trial from November 12, 2024 to January 13, 3025.
3. Based on these new dates, the parties jointly propose the following submission deadlines be changed to reflect the new Final Pretrial Conference date:
 - a. Pretrial Memorandum: (*currently 10/24/2024*), **Proposed: 1/2/2025**
 - b. Pretrial Disclosures: (*currently 9/30/2024*), **Proposed: 12/6/2024**
 - c. Objections to Pretrial Disclosures: (*currently 10/14/2024*), **Proposed: 12/13/2024**

- d. Proposed, jury instructions, any preliminary jury instructions, proposed voir dire questions, motions in limine, witness/exhibit lists, and any designations of deposition Deadline: (*currently 10/16/2024*), **Proposed: 12/20/2024**
 - e. Oppositions to Motions in Limine: (*currently 10/24/2024*), **Proposed: 12/27/2024**
 - f. Trial Briefs: (*currently 10/23/2024*), **Proposed: 1/3/2024**
4. None of the parties will be unduly prejudiced by the granting of this motion.

II. CONCLUSION


Based upon the foregoing facts, reasons, and for any other grounds this Court deems just, Plaintiff respectfully proposes the above extensions of all deadlines.

Dated: October 1, 2024

<u>/s/ Samuel Haaz</u> Robert Zimmerman, Esq. Ryan Hurd, Esq. Samuel Haaz, Esq. Saltz, Mongeluzzi & Bendesky P.C. One Liberty Place, 1650 Market Street, 52 nd Floor, Philadelphia, PA 19103 <i>Attorney for Plaintiff</i>	<u>/s/ Kristen E. Dennison</u> Kristen E. Dennison, Esq. B. Keith Gibson, Esq. Littleton Joyce Ughetta & Kelly, LLP 4 Manhattanville Rd., Ste.202 Purchase, NY 10577 <i>Attorneys for Defendant</i>
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CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and that a true and correct paper copy of the foregoing will be sent those indicated as non-registered participants via first class mail, postage prepaid on this the day of September 30, 2024.

/s/ 
B. Keith Gibson